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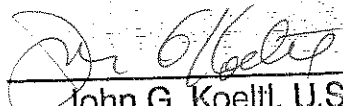
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December 1, 2021

APPLICATION GRANTED
SO ORDERED

VIA CM/ECF

Hon. John G. Koeltl
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

12/2/21

John G. Koeltl, U.S.D.J.

RE: William Chandler v. International Business Machines Corp.,
C.A. No. 1:21-cv-06319

Dear Judge Koeltl:

Pursuant to Your Honor's Individual Rule VI(A)(2), Plaintiffs seek permission to file their Reply in Support of Their Motion for Summary Judgment under seal, along with the accompanying Declaration of Shannon Liss-Riordan.

As discussed in Plaintiff's letter of November 29, 2021 (Dkt. 41), we do not believe that any of these documents should remain sealed or redacted while Your Honor considers the merits of this case, because these judicial documents should be in the public view, and IBM cannot demonstrate that "a particular articulated burden, such as for example, misuse of information for commercial gain, . . . violation of [a] deponent's constitutional rights . . . or disclosure of trade secrets that would 'work a very clearly defined and very serious injury.'" Burgess v. Town of Wallingford, 2012 WL 4344194, at *12 (D. Conn. Sept. 21, 2012).

Nevertheless, we are cognizant that the Court has not yet decided this point. We thus request that the Court direct the parties to confer in order to narrow the portions of the brief and accompanying documents that IBM contends are confidential and should remain redacted or under seal for the time being, so that Plaintiffs can then (as we did with our original motion) publicly file those portions that IBM does not contend are confidential.

L I C H T E N & L I S S - R I O R D A N , P. C.

Sincerely,

/s/ Shannon Liss-Riordan
Shannon Liss-Riordan

Attorney for Plaintiff William Chandler

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2021, a true and accurate copy of the foregoing document was filed via this Court's CM/ECF system.

/s/ Shannon Liss-Riordan
Shannon Liss-Riordan